



United States
Department of
Agriculture

Natural
Resources
Conservation
Service

P.O. Box 2890
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March 10, 1997

SUBJECT: Agricultural Air Quality Task Force

TO: Dan Glickman, Secretary

We, a subcommittee representing the Agricultural Air Quality Task Force, have been asked by the full task force to share with you the prevailing concerns and recommendations arising from the first Task Force session held March 5-6, 1997. In order for you to be aware of these concerns prior to the U.S. Department of Agriculture (USDA) submission to the U.S. Environmental Protection Agency (EPA) on their proposals for ozone and particulate material standards and as a guideline for future considerations by your office relative to agricultural related air quality issues, we respectfully submit the following:

- The EPA proposed air quality standards, in our judgement, are not based on adequate scientific evidence, peer review, and interpretation. Thus, we recommend that it is **premature for EPA to change the existing standard** until scientific evidence is correctly obtained and interpreted. We especially challenge the scientific basis of EPA estimates of agricultural impacts.
- Given the current state of inaccuracies and misconceptions within the EPA air quality standards and applications, and in the spirit of cooperation, we believe it is imperative that USDA develop a **specific Memorandum of Understanding** (MOU) with EPA to transfer technical expertise and support for those air quality issues derived by the Clean Air Scientific Advisory Committee which significantly involve or impact the agricultural industry. Agricultural scientists possess the knowledge to provide this expertise which will maintain the USDA confidence and integrity among the agricultural industry producers. This must be a serious and ongoing commitment by USDA to provide this avenue of knowledge, research, development, and technology transfer.
- We found that many current agricultural air quality issues beg for additional understanding and knowledge well beyond that which exists today. Examples are the unknowns about particulates emitted by wind blown dust, field operations, and nonroad engine emissions and their health implications. We would recommend you consider a Departmental **air quality research initiative** to provide the level of understanding of the environmental impacts this issue demands, in the same vein as that in which we addressed water quality issues in recent years cooperatively among several agencies.
- There are often **multiple policies and programs**, air quality being only one of several, which cause conflict and misunderstanding among producers who are asked to implement controlling practices. For example, some EPA regulations require a reduction in agricultural burning. However, the conservation practice "Prescribed Burning" is an effective tool for

some selected production systems to control pests and diseases. We would encourage you to seek coordination of these several programs.

- We believe that agricultural producers can and will provide many of the control measures required to comply with air quality standards as our society requires, but it is imperative that they be provided the knowledge and flexibility to **design and voluntarily apply these controls locally** as the technology would suggest for best strategies and economic feasibility. We would advise you to provide the leadership, in cooperation with EPA scientists, to our agricultural producers to arrive at these appropriate control strategies.

We appreciate your initiative to appoint us to your public advisory committee on air quality research as set forth in the 1996 Farm Bill. We again express our sincere appreciation for this opportunity to participate with you in this very important agricultural issue, and we look forward to our future deliberations.

USDA Agricultural Air Quality Task Force Subcommittee:

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